



PARDALIS & NOHAVICKA, LLP
ATTORNEYS

December 21, 2020

VIA ECF

Honorable Steven M. Gold
United States Magistrate Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

JOINT STATUS REPORT

RE: *Poulmentis v. Plaza Patisserie, et al.*
Docket No. 1:19-cv-05284-ENV-SMG

Dear Honorable Steven M. Gold:

This office represents Defendants Plaza Patisserie and Chris Kouvaros. with regard to the above-captioned matter. The parties herein correspond jointly to advise the Court of status of this matter.

A Telephone Conference was held on December 15, 2020, before Your Honor, with respect to defense counsel's motion to be relieved as counsel. The Court deferred decision on that motion and with the consent of counsel, directed the following:

Plaintiff's counsel shall provide defendants counsel with a draft settlement agreement forthwith. Defendant shall execute the agreement promptly, and counsel shall submit the agreement, together with a motion for approval of the settlement, by December 23, 2020. In the event defendant does not execute the agreement, counsel for defendant may renew the pending motion to be relieved, and plaintiff may move to enforce the settlement agreement or for other appropriate relief, by January 8, 2021.

Plaintiff's counsel immediately sent the closing documents to defense counsel, and the settlement agreement was forwarded to Chris Kouvaros. I spoke with Chris Kouvaros and explained the situation. He said that he doesn't have money; and, he will not agree on something that he knows he doesn't have. I explained to him his personal exposure, but he just repeated that he doesn't want to sign the settlement and that he can appear and explain it to the judge. I told him that we would not charge him. That did not move him at all. The call was terminated.

Poulmentis v. Plaza Patisserie, et al.
Docket No. 1:19-cv-05284-ENV-SMG
December 21, 2020
Page 2

At this point, I do not believe that there is anything that defense counsel can do to assist in the settlement. If there is something further that I can do, please let me know. Chris Kouvaros, who is copied on this correspondence, may use our Astoria offices to appear remotely before Your Honor at no charge to him.

Respectfully submitted,

PARDALIS & NOHAVICKA, LLP

By: /s/Joseph D. Nohavicka
Joseph D. Nohavicka

cc: Chris Kouvaros